

EXHIBIT C

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

MARY YOUNG,
Plaintiff,

v.

TEXAS SOUTHERN UNIVERSITY,
Defendant.

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§ Civil Action No. 4:23-cv-03888
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DECLARATION OF HAO LE

I, Hao Le, have personal knowledge or knowledge based on my review of business records of Texas Southern University ("TSU"), of all statements below. I hereby make the following declaration under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. My name is Hao Le. I am at least 18 years old, of sound mind, and competent to make this declaration. The facts stated in this declaration are within my personal knowledge and are true and correct.

2. I formerly served as the General Counsel of TSU from approximately July 2018 through June 2023.

3. Mary Young formerly served as TSU's Chief of Police. To my knowledge, while employed at TSU, Mary Young never filed any internal civil rights complaints with Texas Southern University. She never filed an internal complaint alleging that President Crumpton-Young had harassed her because of her sex or gender. She never filed an internal complaint alleging that President Crumpton-Young created a hostile work environment. She never filed an internal complaint alleging sex or gender discrimination. She never filed an internal complaint alleging that President Crumpton-Young harassed any male TSU police officer. And she never filed an internal complaint that she had been retaliated against for any reason.

4. Policy 02.05.13 of Texas Southern University's Manual of Administrative Policies and Procedures outlines the university's internal complaint procedure.

5. On December 1, 2022, Devi Bala placed Mary Young on administrative leave with pay because TSU's investigator, Darlene Brown, determined that she had violated TSU policies.

6. At this time, Devi Bala was serving as TSU's Chief Financial Officer and Vice President of Business and Finance. In that role, Mary Young directly reported to Devi Bala.

7. On December 2, 2022, I became aware that Mary Young had violated the terms of her administrative leave by showing up on campus grounds. I advised Mary Young, through her attorney, that she was required to refrain from being on campus grounds, attending university-sanctioned events, utilizing any university owned-items, and retaliation.

8. Mary Young did not comply with this directive. She continued to come to campus grounds on multiple occasions after December 2, 2022, and spoke to several TSU police officers. I met with each police officer who recounted their interaction with Mary Young. Their accounts are encapsulated in affidavits. To my understanding, the police officers were confused as to the who was the Chief of Police and fearful that if they did not side with Mary Young that upon her return they would lose their jobs. Specifically, Sergeant Barnett wanted to resign due to the state of the department as a result of Mary Young's actions.

9. On January 9, 2023, Devi Bala terminated Mary Young because she violated the terms of her administrative leave along with the information given by several police officers, and because of the internal audit determination that Mary Young had violated TSU policies.

My name is Hao Le. I declare under penalty of perjury that the foregoing is true and correct.

Executed in Harris County, Texas on April 15, 2025.



Hao Le, Declarant